

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

|                     |   |                             |
|---------------------|---|-----------------------------|
| MRI SOFTWARE LLC,   | ) | CASE NO.: 1:12 cv 1082      |
|                     | ) |                             |
| Plaintiff,          | ) |                             |
|                     | ) | JUDGE: Christopher A. Boyko |
| vs.                 | ) |                             |
|                     | ) |                             |
| LYNX SYSTEMS, INC., | ) |                             |
|                     | ) |                             |
| Defendant.          | ) |                             |
|                     | ) |                             |

**JOINT MOTION TO SET CASE SCHEDULE AND FOR STATUS CONFERENCE**

Plaintiff, MRI Software LLC (“MRI”) and Defendant, Lynx Systems, Inc. (“Lynx”) jointly move the Court to set the case schedule below and for a status conference. On May 15, 2013, the parties jointly moved the Court to enter the following deadlines:

- Non-expert Discovery due by 7/15/2013;
- Expert reports due by 9/2/2013 and 10/16/2013;
- Expert Discovery due by 12/2/2013; and
- Dispositive Motions due by 1/15/2014.

*See* Doc. # 75. The May 15 joint motion also memorialized several agreements between the parties as to fact discovery, including as to production of emails and deposition discovery, which remain ongoing, and the parties have engaged in further discovery since filing their joint motion that is not yet complete. The parties have thus determined that additional time is needed for both Lynx and MRI to complete their document productions, and for the parties to complete fact discovery. Accordingly, the parties respectfully request that the Court enter the following schedule:

- Non-expert Discovery due by October 15, 2013;
- Expert reports due by November 15 and December 13;
- Expert Discovery due by January 31; and
- Dispositive Motions due by March 31.

The parties also respectfully request that the Court set a status conference to address the current status of this case, the prospects for resolution, and the pending motions, which include:

- MRI's Motion to Compel (*See* Docket Nos. 45, 67, 71 and 74);<sup>1</sup>
- MRI's Motion to Show Cause Why Lynx Should Not be Held in Contempt of the November 9, 2012 Order (Doc. # 40);
- MRI's Motion for Leave to Respond to Lynx's April 15 Declarations (Doc. #72);
- MRI's Motion for Leave to File Amended Complaint (Doc. 76);
- Lynx's Motion to Compel (Doc. # 81) and MRI's Cross-Motion for attorneys' fees incurred in responding thereto (Doc. # 84).

July 18, 2013

Respectfully submitted,

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<sup>1</sup> As set forth in the parties' May 15 joint motion (Doc. # 75), all issues raised in the foregoing filings were resolved by agreement, except as to MRI's Requests for Production Nos. 11 and 12, which seek certain communications between Lynx and its insurers, and MRI's requests for its attorneys' fees incurred in moving to compel.

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